



Broadwing Inc.
201 E. Fourth Street
P.O. Box 2301
Cincinnati, Ohio 45201-2301

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REGULATORY AUTH.
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OFFICE OF THE
EXECUTIVE SECRETARY

September 6, 2000

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Commission
460 James Robertson Parkway
Nashville, TN 37243-0505

00-00710

Dear Mr. Waddell,

Attached are the responses of Broadwing Local Services Inc. ("BLSI") to the questions raised in your letter dated August 24, 2000.

If you have any questions, please do not hesitate to contact me at (513) 397-1289 or Bob Wentz at (513) 397-1248.

Sincerely,

Donald I. Marshall
Assistant Vice President-Regulatory Affairs
Cincinnati Bell
A Broadwing Company

POSTED
7-12-00

TRA Rules for Local Telecommunications Providers

BLSI has served a copy of the attached letter on the Incumbent Local Exchange Carriers ("ILEC") in Tennessee. A list of those ILECs is also attached. Both the letter and the list of ILECs are marked as Exhibit 1.

Financial Requirements

BLSI is in the process of producing the required surety bond but as of this filing, it is not been made available to us. As soon as it is made available, we will file it with the Authority.

BLSI is a recently established entity. A review of our most recent annual report that was filed with our initial application will indicate that there is significant financial resources available through the parent corporation, Broadwing Inc.

The marketing plans concerning deployment of facilities, proposed services, and the target markets are still being developed and are dependent upon several factors including regulatory approval, interconnection arrangements and cost to deploy the network required to serve customers. BLSI is currently evaluating its proposed market but as this date, the tentatively identified markets are the Memphis, Nashville, and Knoxville metropolitan areas.

Services To Be Provided

BLSI will provide a white pages listing for its subscribers either through inclusion in the ILECs directory, or in a separate directory publication.

BLSI will provide blocking of 900 and 976 numbers upon request by the customer. This service will be free to that customer if that customer requests a block on the initial request for service.

BLSI will provide access to the telecommunications relay service as it is utilized in the areas of service.

BLSI will provide like educational discounts as those outlined in BellSouth's General Subscriber Services Tariff, Section A42.2.2(H).

Toll Dialing Parity Plan for Applicants Providing Voice Grade Service

A revised Toll Dialing Parity plan is attached as Exhibit 2.

Technical Requirements

As stated earlier, BLSI's marketing plans are still being developed. Therefore BLSI is unable to fully respond to this question at this time. Notwithstanding this, BLSI plans to provide service to customers within the above mentioned areas using either its facilities based network or in combination with resold elements purchased from ILECs. If facilities based network is installed, then the local network will be deployed using Synchronous Optical Network ("SONET") ring technology in combination with unbundled network elements and facilities purchased and/or leased from other local exchange carriers. Using the SONET technology, BLSI will have the capability to interface with services from a DS1 up to and including an OC48 transmission level. This backbone network will be deployed using a least cost routing concept. This may include the leasing of fibers from other carriers existing networks, constructing it's own facilities, the purchase of unbundled network elements, and/or any combination of the above.

Tennessee Specific Operational Issues

1. BLSI will ensure that their customers will be afforded county-wide local calling as established in TCA §65-21-114. As our marketing and implementation plans are under development, the answer to how this will be done has not yet been finalized.
2. BLSI is not aware of the existence of this database but will contact BellSouth to become fully versed in its functionalities.
3. BLSI is aware of the ILECs local calling areas in the potential market areas.
4. The determination of what is local and what is toll for a particular NXX is made in a matrix within the switch, whether that switch is provided by BLSI or BLSI uses the switch of another local carrier. BLSI will ensure that customers will not be billed for local calls within their metro calling area.
5. Ms. Piepmeier's telephone number is (513) 397-7462.
6. At this time, BLSI does not intend to telemarket its services in Tennessee.

Numbering Issues

1. At this time, the exchange names that BLSI intends to market within are unknown. As soon as the Marketing plans are more fully developed, BLSI will update the Authority.
2. BLSI intends to establish service in the 615, 931 and the 865 NPAs.
3. BLSI's marketing plans are incomplete at this time and therefore, BLSI cannot fully respond to this question.
4. See the response to questions above.
5. See the response to questions above.
6. See the response to questions above.

Miscellaneous Requirements

1. Given that the marketing plans for BLSI are incomplete, it has not yet been decided if deposits will be required or to what customer segments. If it is decided that deposits are to be required, BLSI will follow those as outlined in Chapter 1220-4-2-11 of the Rules of the Authority.
2. BLSI will file a tariff prior to commencing operations within Tennessee.

EXHIBIT 1



Broadwing Inc.
201 E. Fourth Street
P.O. Box 2301
Cincinnati, Ohio 45201-2301

September 6, 2000

«Company»
«Address1»
«Address2»
«City», «State» «PostalCode»

To Whom It May Concern:

Broadwing Local Services Inc. ("BLSI") is seeking certification from the Tennessee Regulatory Authority to provide local exchange telecommunications services throughout Tennessee.

BLSI's initial target market areas are the Nashville, Memphis, and Knoxville metropolitan statistical areas.

If you have any questions, please contact me at (513) 397-1289 or Bob Wentz at (513) 397-1248.

Sincerely,

Donald I. Marshall
Assistant Vice President
Cincinnati Bell
A Broadwing Company



Tennessee Regulatory Authority

Divisions of the TRA
Telecommunications Division
[BACK](#)
Incumbent Local Exchange Service Providers Certificated In Tennessee
(Facilities-based)

<u>Ardmore Telephone Company, Inc.</u> P.O. Box 549 517 Ardmore Avenue Ardmore, TN 38449 (205) 423-2131 (205) 423-2208 (Fax)	<u>BellSouth</u> 333 Commerce Street Nashville, TN 37201-3300 (615) 214-3800 (615) 214-8820 (Fax)	<u>Century Telephone of Adamsville</u> P.O. Box 405 116 N. Oak Street Adamsville, TN 38310 (901) 632-3311 (901) 632-0232 (Fax)
<u>Century Telephone of Claiborne</u> P.O. Box 100 507 Main Street New Tazewell, TN 37825 (423) 626-4242 (423) 626-5224 (Fax)	<u>Century Telephone of Ooltewah-Collegedale, Inc.</u> P.O. Box 782 5616 Main Street Ooltewah, TN 37363 (423) 238-4102 (423) 238-5699 (Fax)	<u>Citizens Communications Company of Tennessee</u> P.O. Box 770 300 Bland Street Bluefield, WV 24701
<u>Citizens Communications Company Of The Volunteer State</u> P.O. Box 770 300 Bland Street Bluefield, WV 24701	<u>Loretto Telephone Company, Inc.</u> P.O. Box 130 Loretto, TN 38469 (931) 853-4351 (931) 853-4329 (Fax)	<u>Millington Telephone Company, Inc.</u> 4880 Navy Road Millington, TN 38053 (901) 872-3311 (901) 873-0022 (Fax)
<u>Sprint-United</u> 112 Sixth Street Bristol, TN 37620 (423) 968-8161 (423) 968-3148 (Fax)	<u>TDS Telecom-Concord Telephone Exchange, Inc.</u> P.O. Box 22610 701 Concord Road Knoxville, TN 37933-0610 (423) 966-5828 (423) 966-9000 (Fax)	<u>TDS Telecom-Humphreys County Telephone Company</u> P.O. Box 552 203 Long Street New Johnsonville, TN 37134-0552 (931) 535-2200 (931) 535-3309 (Fax)

<u>TDS Telecom-Tellico Telephone Company, Inc.</u> P.O. Box 9 102 Spence Street Tellico Plains, TN 37385-0009 (423) 671-4600 (423) 253-7080 (Fax)	<u>TDS Telecom-Tennessee Telephone Company</u> P.O. Box 18139 Knoxville, TN 37928-2139 (423) 922-3535 (423) 922-9515 (Fax)	<u>TEC-Crockett Telephone Company, Inc.</u> P.O. Box 7 Friendship, TN 38034 (901) 677-8181
<u>TEC-People's Telephone Company, Inc.</u> P.O. Box 310 Erin, TN 37061 (931) 289-4221 (931) 289-4220 (Fax)	<u>TEC-West Tennessee Telephone Company, Inc.</u> P.O. Box 10 244 E. Main Street Bradford, TN 38316 (901) 742-2211 (901) 742-2212 (Fax)	<u>United Telephone Company</u> P.O. Box 38 120 Taylor Street Chapel Hill, TN 37034 (931) 364-2289 (931) 364-7202 (Fax)

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EXHIBIT 2

BROADWING LOCAL SERVICES, INC.

INTRALATA TOLL DIALING PARITY PLAN

I. Purpose

The purpose of this plan is to fully describe the IntraLATA toll dialing parity plan to be utilized by Broadwing Local Services, Inc. ("BLSI"). This plan, upon implementation, will provide customers within the State of Tennessee the opportunity to select their telecommunications provider of choice for the routing of their IntraLATA toll calls. BLSI agrees that it will comply with all FCC and TRA rules and regulations that address dialing parity. BLSI also agrees to provide nondiscriminatory access to telephone numbers, operator and directory services, directory assistance, and directory listings.

II. Implementation Schedule

BLSI will offer IntraLATA toll dialing parity in all of the Tennessee exchanges at the same time that service is initiated in Tennessee. Exhibit A provides a list of those Tennessee exchanges in which BLSI intends to provide service. The exchanges, which BLSI intends to initially operate, are located in the Nashville, Memphis, and Knoxville LATAs.

III. Carrier Selection Methodology

The carrier selection utilized by BLSI will be a full 2-PIC methodology. By utilizing this methodology, a customer will be able to select a carrier-to-carrier for InterLATA toll calls and, if the customer elects to do so, another carrier to carry their IntraLATA toll calls. The BLSI customer service representatives will

be trained to fully explain the 2-PIC plan to customers and to make changes to the customer's account upon receiving a request to do so from the customer or another carrier. If the customer verbally requests a new InterLATA or IntraLATA carrier, that customer will be able to make such a choice from a randomly generated list of available carriers.

For new customers, BLSI will provide a randomly generated list of available carriers to the customer upon receiving a request from a customer to establish service as a BLSI customer. This list will include BLSI. At that time, carriers may choose to either make a selection for an IntraLATA carrier or not to make a selection. In the latter case, if the customer does not make a selection, that customer will be classed as a no-PIC customer and will not be assigned an IntraLATA carrier. This customer, in order to make an IntraLATA toll call, must then use a dial-around access code (10-10-XXX) to place such a call and must continue to do so until a carrier is selected.

For existing customers who seek to change their IntraLATA carrier, a PIC change charge, as contained in the filed tariff, will be charged. If an existing customer requests a change to their IntraLATA and InterLATA carrier in the same contact, the PIC change charge will be assessed only once. If however, a customer, in two different contacts with the company, requests that their InterLATA carrier be changed in one contact and that their IntraLATA carrier

be changed in a separate and subsequent contact, two PIC change charges will be assessed.

For the first 90 days after the establishment of service in Tennessee, customers will not be assessed a PIC change charge. A customer will not be assessed a PIC change charge if such a request is made at the time of establishment of that customers service.

BLSI is subject to any and all rules regarding the slamming as defined in TRA Rule 1220-4-2-.56, Sections (2) – (6).

IV. Customer Education and Notification

All customers, upon their initial contact for service with BLSI, will be fully informed by the customer service representative of the opportunity to select an IntraLATA toll carrier.

V. Access to Directory Assistance and Operator Services

Access to both Directory Assistance and Operator services will be available through the customers local exchange carrier.